

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**NICOLE HINSON, Individually and as  
Next Friend of C.H., a Minor; and  
CAMERON HINSON, Texas residents,**

**Plaintiffs**

**v.**

**DOREL JUVENILE GROUP, INC., a  
Massachusetts corporation**

**Defendant.**

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**Cause No. 2:15-CV-713-JRG-RSP**

**Jury Demand**

**PLAINTIFFS' OBJECTIONS TO DEFENDANT'S PRE-TRIAL DISLCOSURES**

Pursuant to this Court's Discovery Order, Plaintiffs Nicole Hinson, Individually and as Next Friend of C.H., a Minor, and Cameron Hinson file their objections to Defendant's Pre-Trial Disclosures. These include Objections to Defendant's Deposition Designations (Exhibit "A"), Objections to Defendant's Exhibit List (Exhibit "B"), and Objections to Defendant's Witness List (Exhibit "C").

For the reasons contained in the three Exhibits, Plaintiffs pray that the Court sustain their Objections. Plaintiffs also request all such further relief, both at law and in equity, to which they may be justly entitled to receive.

Respectfully submitted,

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**ATTORNEYS FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that a true and correct copy of this pleading was served on counsel for defendant via electronic means on this 27th day of May 2016.

/s/ Jeffrey T. Embry  
Jeffery T. Embry